



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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MAR 10 2015

Ref: 8EPR-N

Kathryn J. Conant, Acting Forest Supervisor
Bridger-Teton National Forest
340 North Cache Avenue
P.O. Box 1888
Jackson, Wyoming 83001

Re: Final Supplement to the Environmental Impact Statement for Long Term Special Use
Authorization for Winter Elk Management Activities at Alkali Creek Feedground
CEQ # 20150026

Dear Ms. Conant:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) January 2015 Final Supplement to the Environmental Impact Statement (SEIS) for Long Term Special Use Authorization for Wyoming Game and Fish Commission to Use National Forest System Lands for their Winter Elk Management Activities at Alkali Creek Feedground (Feedground). Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

Background

The USFS proposes to authorize the Wyoming Game and Fish Commission (WGFC) to continue use of 91 acres of National Forest System lands at the Feedground for ongoing winter elk management programs. The Record of Decision for the 2008 EIS that analyzed Alkali Creek and five other existing feedgrounds indicated that more information was needed prior to a decision for WGFC use at Alkali Creek. Therefore, the Final SEIS that supplements the 2008 EIS only examines two alternatives; the Preferred Alternative, which is continued authorization of Feedground facilities at Alkali Creek, and the No Action alternative that would not grant authorization.

The Final SEIS describes changed circumstances since 2008, including changes in species listed as threatened or sensitive, designation of Wild and Scenic Rivers, impacts to the Gros Ventre Wilderness, issuance of the Pronghorn Forest Plan Amendment, effects related to recent fire activity, current information related to wildlife diseases, and effects of changes in WGFC regulations. The Final SEIS documents that both alternatives could result in unavoidable adverse effects to water quality due to wetland and streambank damage, erosion and sedimentation. Slopes above Alkali Creek are heavily trailed by elk, which potentially could cause streambank alteration, reduced channel function, and increased sediment delivery to the creek. There could also be irreversible losses in willow habitat within and adjacent to the Feedground, as well as potential irretrievable losses of aspen habitat, due to heavy browsing by elk.

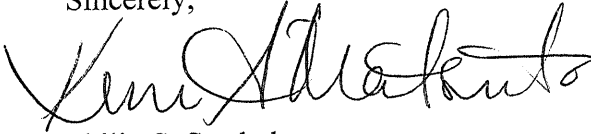

Comments and Recommendations

We appreciate the efforts of the USFS to include additional information in the Final SEIS related to monitoring the effectiveness of the 100-foot buffer mitigation measure that restricts distribution of hay for feeding near wetlands or riparian areas. The Final SEIS also states that additional measures will be considered if the desired conditions are not achieved. The EPA recommends, to the extent possible, that these additional potential measures be detailed in the Final ROD. Although the USFS does not intend to use adaptive management in the evaluation and decision process, we recommend that certain criteria be evaluated as part of the Operating Plan for the Feedgrounds on the Jackson Ranger District annual review that would allow for changes in operations if monitoring does not indicate progress toward the desired conditions of stream health and vegetation. Such criteria may include specific thresholds with identified indicators for each impacted resource as well as targets that specify a desired future condition.

Closing

We appreciate the opportunity to review the Final SEIS. Thank you for considering our input. If we may provide further explanation of our comments during this stage of your planning process, please contact Melanie Wasco of my staff at (303) 312-6540. Alternatively, I can be reached at (303) 312-6704.

Sincerely,

Philip S. Strobel

Acting Director

NEPA Compliance and Review Program

Office of Ecosystems Protection and Remediation